

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

CommScope, Inc., CommScope Inc. of ) Civil Action No. 19-cv-15962-JXN  
North Carolina, and CommScope ) LDW  
Technologies, LLC, )

Plaintiffs,

V.

Rosenberger Technology (Kunshan)	)	<b>NOTICE OF MOTION TO SEAL</b>
Co. Ltd., <sup>1</sup> Rosenberger Asia Pacific	)	
Electronic Co., Ltd., Rosenberger	)	
Technology LLC, Rosenberger USA	)	
Corp., Rosenberger North America	)	
Pennsauken, Inc., Rosenberger Site	)	
Solutions, LLC, Rosenberger	)	
Hochfrequenztechnik GmbH & Co.	)	
KG, Northwest Instrument, Inc., and	)	
CellMax Technologies AB	)	

## Defendants

**TO: ALL COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that, on January 2, 2024 or as soon thereafter as the parties may be heard, Faegre Drinker Biddle & Reath LLP and Norris McLaughlin, P.A., attorneys for Plaintiffs CommScope, Inc., CommScope Inc. of North Carolina, and CommScope Technologies, LLC (“CommScope”), and King

<sup>1</sup> Rosenberger Technology (Kunshan) Co., Ltd. is also known as PROSE Technologies (Suzhou) Co., Ltd., and Rosenberger Technology, LLC is also known as PROSE Technologies, LLC.

& Wood Mallesons and Cullen and Dykman LLP, attorneys for Defendants Rosenberger Technology (Kunshan) Co. Ltd., Rosenberger Asia Pacific Electronic Co., Ltd., and Rosenberger Technology LLC (collectively, “Rosenberger” and, together with CommScope, the “Movants”) shall move before the Honorable Leda Dunn Wettre, U.S. Magistrate Judge, in the U.S. District Court, District of New Jersey—Newark, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Room MLK 3C, Newark, New Jersey 07101—for an Order pursuant to L. Civ. R. 5.3(c), sealing portions of the materials submitted with the parties’ Joint Submission Regarding Plaintiffs’ Discovery Issue (Dkt. 561) and Exhibits thereto (Dkt. 561-1) and the parties’ Updated Joint Submission Regarding Plaintiffs’ Discovery Issue (Dkt. 562) and Exhibits thereto (Dkt. 562-2) (collectively, the “Identified Materials”).

The Parties have met and conferred on the Joint Motion. There are no objections to the Joint Motion.

**PLEASE TAKE FURTHER NOTICE** that in support of the Joint Motion, the Movants will rely upon the Declaration of Farid Firouzbakht, the Declaration of Alicia Yu, the Consolidated Index in Support of the Joint Motion to Seal, and all other pleadings and memoranda on file in this matter.

**PLEASE TAKE FURTHER NOTICE** that the Movants submit a proposed form of Order with proposed findings of fact and conclusions of law herewith.

Dated: December 1, 2023

/s/ Vincent Filardo Jr.

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Dated: December 1, 2023

/s/ Edward G. Sponzilli

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